

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANDREW K. MITCHELL,

Defendant.

**CASE NO. 2:19-CR-053
CHIEF JUDGE SARGUS
MAGISTRATE JUDGE JOLSON**

**GOVERNMENT'S MOTION FOR PROTECTIVE ORDER FOR DOCUMENTS
PRODUCED DURING DISCOVERY**

The United States of America, by and through undersigned counsel, hereby requests that the Court issue a protective order, pursuant to Federal Rule of Criminal Procedure 16(d)(1), for documents produced during the course of discovery in this case.

On March 7, 2019, the grand jury returned a seven-count Indictment against the defendant. (ECF No. 3.) The defendant was arraigned on March 21, 2019. The United States has provided its initial discovery production to defense counsel on March 29, 2019, which includes thousands of pages of discovery. The United States will continue to comply with its ongoing discovery obligations.

Pursuant to Federal Rule of Criminal Procedure 16(d)(1), the Court may restrict inspection of discovery for good cause shown. Throughout the investigation of this case, the United States has collected numerous financial records from banking institutions and other sources. The records, which are relevant to the prosecution of this case, contain sensitive and confidential information, including, but not limited to: bank statements, social security numbers, and other personal

identification information of both the defendant and the victims. Given the voluminous nature of the discovery in this case and the short period of time for the United States to produce discovery to defense, redaction of this information is unduly burdensome. More significantly, it may prevent the defendant from having full and complete access to information necessary to assess the United States's evidence.

The United States, therefore, requests that the Court issue a protective order for these confidential documents, stating that any confidential financial and/or identification information produced pursuant to the United States's discovery obligations be used only for purposes of defense preparation and that distribution of such materials be made only for such purposes. The United States has conferred with counsel for the defendant, who has no objection to the issuance of such an order as proposed.

Respectfully submitted,

BENJAMIN C. GLASSMAN
United States Attorney

s/Jessica H. Kim

JESSICA H. KIM (0087831)
KEVIN W. KELLEY (0042406)
Assistant United States Attorneys
303 Marconi Boulevard, Suite 200
Columbus, Ohio 43215
Office: (614) 469-5715
Fax: (614) 469-5653
E-mail: Jessica.Kim@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 29th day of March 2019, electronically on all counsel of record.

s/Jessica H. Kim

JESSICA H. KIM (0087831)

Assistant United States Attorney